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COUNTY DEPARTMENT OF REGIONAL PLANNING

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
15

16 CLINTON BROWN,

17 Plaintiff,

18 v.

19 CLARK R. TAYLOR, AICP, THE
20 LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL
21 PLANNING,

22 Defendants.
23

Case No. 2:22-cv-09203-MEMF-KS

**DECLARATION OF JONATHAN
FANG, ESQ.**

Assigned to:
Hon. Maame Ewusi-Mensah Frimpong
Courtroom "8B"

Magistrate Judge Karen L. Stevenson
Courtroom "580"

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1 I, Jonathan Fang, declare as follows:

2 1. I am an attorney duly licensed to practice before this Court and am an associate
3 with Hurrell Cantrall LLP, attorneys of record for Defendant Clark R. Taylor. AICP. The Los
4 Angeles County Department of Regional Planning herein. The facts set forth herein are of my
5 own personal knowledge and if sworn I could and would testify competently thereto.

6 2. Clinton Brown never contacted Defendant's counsel to inform us of his intention to
7 file his Motion to Accept, Reject, or Modify Magistrate's Order (IN PART) or to discuss the
8 substance of his motion and any potential resolution.

9 3. Mr. Brown's serial motion and filings continue to be vexatious and frivolous and
10 create an unnecessary burden on the time and resource of Defendant.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 Executed on May 25, 2023, at Los Angeles, California.

14
15 *Jonathan Fang*

16 _____
Jonathan Fang